Message

From: Ma, Grace [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=793249D28E87408D8DAB89A6A3C770BF-GMA02]

Sent: 9/1/2021 9:59:01 PM

To: Alex.MacDonald@waterboards.ca.gov
Subject: Area 40 RDIP construction completion report

Dear Alex,

I started leaving a voice mail on your work number, but an automated message asked for my subscriber number.

I'm the new EPA remedial project manager for Aerojet. I'm taking over Chuck Swanson's roles and responsibilities for Area 40, vapor intrusion and other issues that Daewon Rojas-Mickelson doesn't manage.

Are you reviewing the Area 40 Remedial Design and Implementation Plan Phase 2 Construction Completion Report? Do you think that Aerojet's cleanup activities meet DTSC's remedial cleanup goals and criteria? Do you think any additional sampling or work is required?

I asked Peter MacNicholl the same questions. He didn't have any concerns, but he didn't respond to my question about additional sampling or additional work.

I have two comments on the report that I'll send to everyone. I discussed the report with EPA's new contractor EA. Aerojet left some perchlorate contamination in place above the Remedial Design and Implementation Plan goals but below residential criteria. Also, there is a discrepancy for the key in thickness at one station in the construction contractor's permeable reactive barrier report in Appendix B.

I told Pete that EPA will use the Area 40 Remedial Design and Implementation Plan Phase 2 Construction Completion Report as the basis and data set for our Record of Decision (ROD). We need to be confident that the completed work meets DTSC's cleanup requirements. If we can't verify that the cleanup was done correctly and completely, then EPA would have to sample and certify. That would add more time and effort. If EPA does additional cleanup, then we're no longer writing a no action ROD.

EPA would not approve this report since Aerojet performed DTSC approved remedial work under DTSC oversight. My understanding is that DTSC would approve this report, but please let me know if you're involved in the approval process.

Thank you, Grace

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